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JANUARY 20, 2017

Re: Anthony, et al. v. City of N.Y., et al., No. 15 Civ. 6364 (PKC) (RER)

Dear Judge Reyes:

I represent Plaintiffs in the above-captioned Section 1983 matter. The Parties have a telephone conference with the Court on January 24, 2017, at 4pm to discuss outstanding discovery and pre-motion conference letters. I write in advance of the conference to provide the Parties' joint proposed schedule for the discovery and pre-motion letter motions and responses. Later today, I will file a Plaintiff discovery motion and status report, and Defendants will respond before the conference as they see fit.

The Parties' joint proposed schedule is:

EVENT	DATE
Close of fact discovery	February 10, 2017
Letter certifying close of fact discovery	February 10, 2017
Pre-motion conference letters due relating to anticipated cross-motions for summary judgment	March 6, 2017
Responses in opposition to pre-motion conference letters	March 13, 2017

Sincerely,

Ryan Lozar